21-APR-94 14:43:40 TV CHANNEL STUDY PROGRAM

WHSG BLCT-910304KF MONROE GA US TRINITY BROADCASTING NETWORK
Channel 63 Zero Offset ! IC N Lat 33-44-22 W Long 84-00-14 Zone 2 Cutoff Date Last Update 910702
ERP: 5000.000 kW HAAT: 363.0 meters; RCAMSL: 617.0 meters Beam Tilt Docket
Directional Antenna: Make: AND Model: ODD910304KF Ref Azimuth: 0.0

Azimuth (Deg)	ERP (kW)	HAAT (m)	DEPRESS (Deg)	80.0(dBu) (kM)	74.0(dBu) (kM)	64.0(dBu) (kM)
0.0	4418.000	321.7	0.50	55.9	65.1	83.9
45.0	3160.125	347.3	0.52	55.1	64.4	83.4
90.0	840.500	374.2	0.54	47.6	56.9	73.9
135.0	800.000	397.1	0.55	48.2	57.7	75.2
180.0	450.000	377.4	0.54	43.5	52.8	69.0
225.0	1830.125	374.8	0.54	52.9	62.3	80.9
270.0	3784.500	349.7	0.52	56.4	65.9	85.4
315.0	4851.125	359.5	0.53	58.6	68.4	88.8

Average: 362.7 Meters

WHSG LICENSE

********** CHANNEL STUDY **********

1 - COLUMBUS GA US Ch 48 Z TA E Zone: 2 Lat 32-28-07 Sep: 168.3 kM
ERP: kW HAAT: m DA: Cutoff: Lon 84-59-24 Req: 119.9 kM
Bear: 213.3 D.True

2 - CARROLLTON GA US Ch 49 - TA E Zone: 2 Lat 33-34-48 Sep: 101.1 kM
ERP: kW HAAT: m DA: Cutoff: Lon 85-04-36 Req: 95.7 kM
Bear: 260.2 D.True

3 - MONTGOMERY AL US Ch 63 + TA E Zone: 3 Lat 32-22-54 Sep: 262.7 kM
ERP: kW HAAT: m DA: Cutoff: Lon 86-18-30 Req: 280.8 kM SHORT
Bear: 235.5 D.True

4 BLCT-910304KF WHSG MONROE GA US Ch 63 Z TV LIC C Zone: 2 Lat 33-44-22 Sep: 0.0 kM
TRINITY BROADCASTING NETWORK ERP: 5000 kW HAAT: 363 m DA: Y Cutoff: Lon 84-00-14 Req: 280.8 kM -
Bear: 180.0 D.True

5 BPCT-920228KE NEW MONROE GA US Ch 63 Z TV APP C Zone: 2 Lat 33-44-38 Sep: 0.8 kM
GLENDALE BROADCASTING COMPANY ERP: 5000 kW HAAT: 360 m DA: Y Cutoff: Lon 84-00-39 Req: 280.8 kM MX
MX WITH RENEWAL OF WHSG Bear: 307.6 D.True

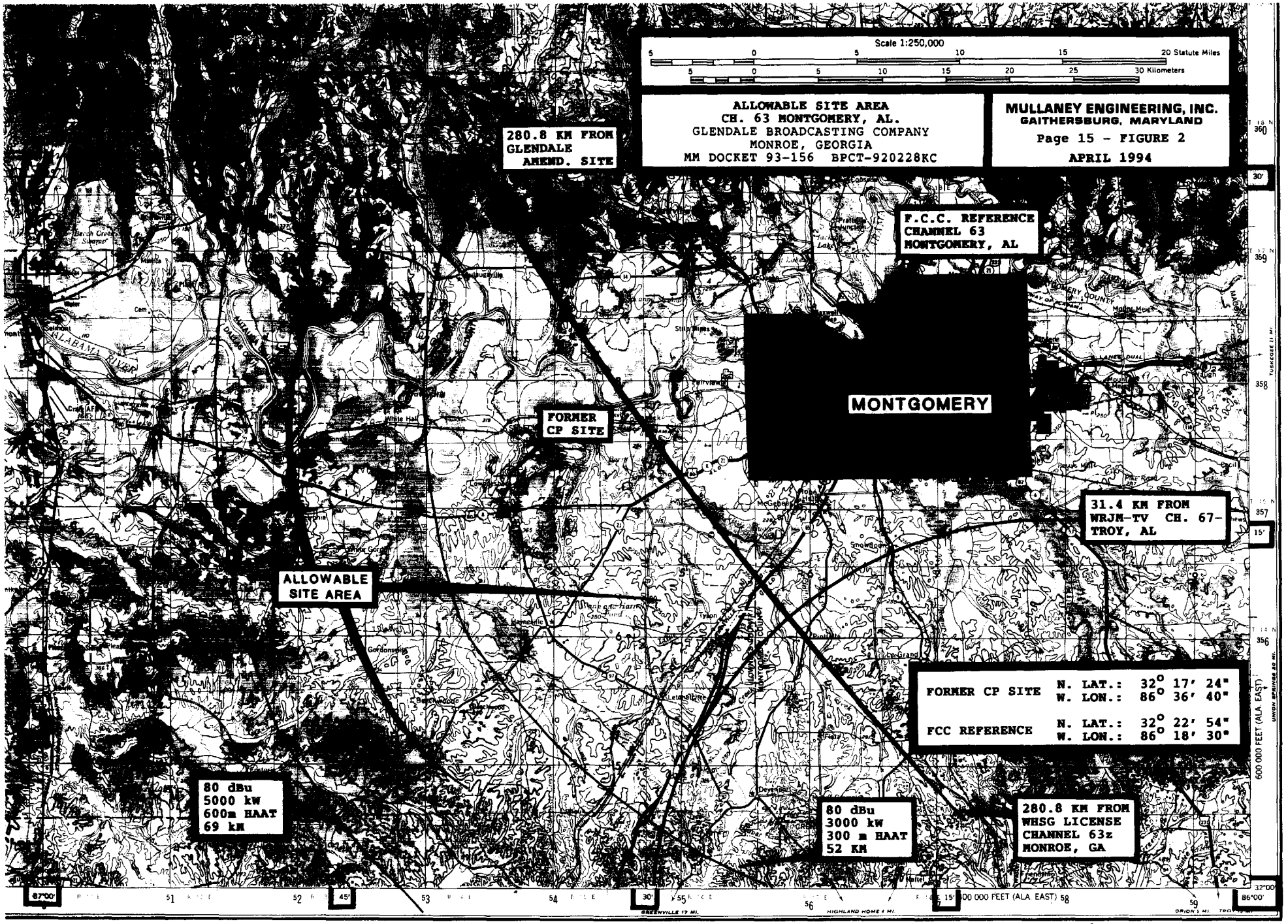
6 BPCT-921201LG WQHB SUMTER SC US Ch 63 - TV CP C Zone: 2 Lat 34-06-10 Sep: 301.6 kM
MCLAUGHLIN BROADCASTING, INC. ERP: 1100 kW HAAT: 343 m DA: N Cutoff: Lon 80-46-18 Req: 280.8 kM
Bear: 81.4 D.True

7 BLCT-901130KF WGNM MACON GA US Ch 64 - TV LIC C Zone: 2 Lat 32-44-58 Sep: 117.3 kM
GOOD NEWS TELEVISION ERP: 51.3 kW HAAT: 185 m DA: Y Cutoff: Lon 83-33-35 Req: 87.7 kM
Bear: 159.3 D.True

********** END OF STUDY **********

TV CHANNEL STUDY
FROM WHSG'S LICENSED SITE
GLENDALE BROADCASTING COMPANY
MONROE, GEORGIA
MM DOCKET 93-156 BPCT-920228KC

MULLANEY ENGINEERING, INC.
GAITHERSBURG, MARYLAND
Page 14 - FIGURE 1-C
APRIL 1994



LOCATION DIAGRAM

GRID ZONE DESIGNATION:

TO GIVE A STANDARD REFERENCE ON

25-APR-94 17:37:03 TV CHANNEL STUDY PROGRAM

VAC - MONTGOMERY AL US
Channel 63 Plus Offset N Lat 32-22-54 W Long 86-18-30 Zone 3 Cutoff Date Last Update
ERP: 1000.000 kW HAAT: 300.0 meters; RCAMSL: 400.0 meters Docket
The above parameters were keyed in by the User.

Azimuth (Deg)	ERP (kW)	HAAT (m)	DEPRESS (Deg)	80.0(dBu) (kM)	74.0(dBu) (kM)	64.0(dBu) (kM)
0.0	1000.000	356.2	0.52	47.9	57.1	73.9
45.0	1000.000	340.3	0.51	47.1	56.3	72.6
90.0	1000.000	337.2	0.51	47.0	56.1	72.3
135.0	1000.000	336.5	0.51	46.9	56.0	72.3
180.0	1000.000	339.7	0.51	47.1	56.2	72.6
225.0	1000.000	342.9	0.51	47.3	56.4	72.8
270.0	1000.000	359.0	0.52	48.1	57.3	74.2
315.0	1000.000	333.3	0.51	46.8	55.9	72.0

Average: 343.1 Meters

VACANCY

********** CHANNEL STUDY **********

1 - COLUMBUS GA US Ch 48 Z TA E Zone: 2 Lat 32-28-07 Sep: 124.4 kM
ERP: kW HAAT: m DA: Cutoff: Lon 84-59-24 Req: 119.9 kM
Bear: 85.2 D.True

2 - BIRMINGHAM AL US Ch 62 + TA E Zone: 2 Lat 33-31-01 Sep: 134.4 kM
ERP: kW HAAT: m DA: Cutoff: Lon 86-48-36 Req: 87.7 kM
Bear: 339.8 D.True

3 - MONTGOMERY AL US Ch 63 + TA E Zone: 3 Lat 32-22-54 Sep: 0.0 kM
ERP: kW HAAT: m DA: Cutoff: Lon 86-18-30 Req: 329.0 kM -
Bear: 180.0 D.True

4 BLCT-910304KF WHSG MONROE GA US Ch 63 Z TV LIC C Zone: 2 Lat 33-44-22 Sep: 262.7 kM
TRINITY BROADCASTING NETWORK ERP: 5000 kW HAAT: 363 m DA: Y Cutoff: Lon 84-00-14 Req: 280.8 kM SHORT
Bear: 54.3 D.True

5 BPCT-920228KE NEW MONROE GA US Ch 63 Z TV APP C Zone: 2 Lat 33-44-38 Sep: 262.4 kM
GLENDALE BROADCASTING COMPANY ERP: 5000 kW HAAT: 360 m DA: Y Cutoff: Lon 84-00-39 Req: 280.8 kM SHORT
MX WITH RENEWAL OF WHSG Bear: 54.1 D.True

6 BMPCT-930525KE WRJMTV TROY AL US Ch 67 Z TV CP MOD C Zone: 3 Lat 31-58-32 Sep: 47.1 kM
STATE DOOR DEVELOPMENT, INC. ERP: 1260 kW HAAT: 592 m DA: Y Cutoff: Lon 86-09-46 Req: 31.4 kM
Bear: 163.1 D.True

********** END OF STUDY **********

22-APR-94 09:55:39 TV CHANNEL STUDY PROGRAM

TROY STATE UNIV. CP MONTGOMERY AL US
Channel 63 Plus Offset N Lat 32-17-24 W Long 86-30-40 Zone 3 Cutoff Date Last Update
ERP: 1000.000 kW HAAT: 300.0 meters; RCAMSL: 400.0 meters Docket
The above parameters were keyed in by the User.

Azimuth (Deg)	ERP (kW)	HAAT (m)	DEPRESS (Deg)	80.0(dBu) (kM)	74.0(dBu) (kM)	64.0(dBu) (kM)
0.0	1000.000	355.3	0.52	47.9	57.1	73.9
45.0	1000.000	355.4	0.52	47.9	57.1	73.9
90.0	1000.000	337.3	0.51	47.0	56.1	72.4
135.0	1000.000	334.4	0.51	46.8	55.9	72.1
180.0	1000.000	324.5	0.50	46.3	55.4	71.3
225.0	1000.000	340.0	0.51	47.1	56.2	72.6
270.0	1000.000	337.8	0.51	47.0	56.1	72.4
315.0	1000.000	364.8	0.53	48.3	57.6	74.7

Average: 343.7 Meters

TROY STATE UNIV. CP

********** CHANNEL STUDY **********

1 - COLUMBUS GA US Ch 48 Z TA E Zone: 2 Lat 32-28-07 Sep: 144.5 kM
ERP: kW HAAT: m DA: Cutoff: Lon 84-59-24 Req: 119.9 kM
Bear: 81.7 D.True

2 - BIRMINGHAM AL US Ch 62 + TA E Zone: 2 Lat 33-31-01 Sep: 138.9 kM
ERP: kW HAAT: m DA: Cutoff: Lon 86-48-36 Req: 87.7 kM
Bear: 348.5 D.True

3 - MONTGOMERY AL US Ch 63 + TA E Zone: 3 Lat 32-22-54 Sep: 21.6 kM
ERP: kW HAAT: m DA: Cutoff: Lon 86-18-30 Req: 329.0 kM -
Bear: 61.8 D.True

4 BLCT-910304KF WHSG MONROE GA US Ch 63 Z TV LIC C Zone: 2 Lat 33-44-22 Sep: 284.1 kM
TRINITY BROADCASTING NETWORK ERP: 5000 kW HAAT: 363 m DA: Y Cutoff: Lon 84-00-14 Req: 280.8 kM
Bear: 54.7 D.True

5 BPCT-920228KE NEW MONROE GA US Ch 63 Z TV APP C Zone: 2 Lat 33-44-38 Sep: 283.9 kM
GLENDALE BROADCASTING COMPANY ERP: 5000 kW HAAT: 360 m DA: Y Cutoff: Lon 84-00-39 Req: 280.8 kM
MX WITH RENEWAL OF WHSG Bear: 54.6 D.True

6 BMPCT-930525KE WRJMTV TROY AL US Ch 67 Z TV CP MOD C Zone: 3 Lat 31-58-32 Sep: 47.9 kM
STATE DOOR DEVELOPMENT, INC. ERP: 1260 kW HAAT: 592 m DA: Y Cutoff: Lon 86-09-46 Req: 31.4 kM
Bear: 136.7 D.True

********** END OF STUDY **********

TV CHANNEL STUDY FROM TROY'S CP SITE
GLENDALE BROADCASTING COMPANY
MONROE, GEORGIA
MM DOCKET 93-156 BPCT-920228KC

MULLANEY ENGINEERING, INC.
GAITHERSBURG, MARYLAND

APRIL 1994

THE APPLICANT

George F. Gardner, under penalty of perjury, declares that the following is true and correct to the best of his knowledge:

Glendale Broadcasting Company (Glendale) is a corporation organized under Delaware law. The only class of stock which is authorized is common voting stock. I am the owner of fifty-one shares of Glendale's common voting stock, and Mary Anne Adams, my daughter, is the owner of forty-nine shares of common voting stock. Ms. Adams and myself are the two directors of the corporation. I am the President, Treasurer, and Secretary of Glendale, and Ms. Adams is the Vice President, Assistant Secretary and Assistant Treasurer. There are no other officers, directors, or stockholders of Glendale.

April 22, 1994
Date

George F. Gardner
George F. Gardner

Federal Communications Commission

Docket No. 93-156 Exhibit No. 1

Presented by Calendale

Disposition { Identified 5.18.94 / Received 5.18.94 / Rejected

Reporter AW

Date 5.18.94

DIVERSIFICATION

George F. Gardner, under penalty of perjury, declares that the following is true and correct to the best of his knowledge.

George F. Gardner holds 100% voting control of the following mass media facilities:

A. LOW POWER TELEVISION (LPTV) STATION

Low power television station W40AF, Dillsburg, Pennsylvania.

B. CABLE TELEVISION (CATV) SYSTEMS

TV Cable of Carlisle

Subscribers:	16,103
Communities:	Carlisle, Mt. Holly Springs, North Middleton, South Middleton, Monroe, Middlesex, Silver Spring, Dickinson, West Pennsboro, Carroll, and Penn (all in Pennsylvania)
Active Channels:	56
Local Origination:	1 channel

TV Cable of Berkeley County

Subscribers:	4046
Communities:	Berkeley County and Hedgesville (West Virginia)
Active Channels:	42
Local Origination:	1 channel

Federal Communications Commission

Docket No. 93-156 Exhibit No. 2

Presented by Glendale

Disposition { Identified 5-18-94 / Received 5-18-94 / Rejected

Reporter AMW

Date 5-18-94

TV Cable of Central PA (Avis Headend)

Subscribers:	6893
Communities:	Renovo, South Renovo, Chapman, Noyes, Avis, Salladasburg, Pine Creek, Wayne, Porter, Crawford, Dunnstable, Nippenose, Piatt, Watson, Mifflin, Cummings, Limestone, and Jersey Shore (all in Pennsylvania)
Active Channels:	39
Local Origination:	1 channel

TV Cable of Central PA (Hughesville Headend)

Subscribers:	4307
Communities:	Muncy, Hughesville, Muncy Creek, Wolf, Picture Rocks, Muncy Township, Penn, and Shrewsbury (all in Pennsylvania)
Active Channels:	32
Local Origination:	1 channel

TV Cable of Waynesboro (Ft. Loudon Headend)

Subscribers:	1401
Communities:	Peters, Metal, St. Thomas, and Hamilton (all in Pennsylvania)
Active Channels:	33
Local Origination:	1 channel

TV Cable of Waynesboro (Blue Ridge Summit Headend)

Subscribers:	8036
Communities:	Waynesboro, Washington, Quincy, Mont Alto, and Guilford (all in Pennsylvania), Washington County, MD, Frederick County, MD
Active Channels:	43
Local Origination:	1 channel

GH Cable Arizona (Payson Headend)

Subscribers:	4577
Communities:	Payson, Gila County, Round Valley, Oxbow Estates, Mesa Del, and Star Valley (all in Arizona)
Active Channels:	36
Local Origination:	1 channel

GH Cable Arizona (Pine Strawberry Headend)

Subscribers:	1272
Communities:	Pine, Strawberry, and Gila County (all in Arizona)
Active Channels:	23
Local Origination:	None

GH Cable Arizona (Christopher Creek Headend)

Subscribers:	122
Communities:	Christopher Creek and Gila County (Arizona)
Active Channels:	12
Local Origination:	None

GH Cable Arizona (Bear Flats Headend)

Subscribers:	26
Communities:	Bear Flats and Gila County (Arizona)
Active Channels:	5
Local Origination:	None

GH Cable Arizona (Kohls Ranch Headend)

Subscribers:	184
Communities:	Kohls Ranch, Gila County, Tonto Village, and Thompson Draw (Arizona)
Active Channels:	12
Local Origination:	None

GH Cable Arizona (Williams Headend)

Subscribers:	1040
Communities:	Williams and Coconino County (Arizona)
Active Channels:	23
Local Origination:	None

GH Cable Arizona (Concho Headend)

Subscribers:	153
Communities:	Concho and Apache County (Arizona)
Active Channels:	13
Local Origination:	None

Glendale Broadcasting Company
MM Docket No. 93-156
Exhibit No. 2
Page 5 of 5

GH Cable Arizona (St. Johns Headend)

Subscribers:	742
Communities:	St. Johns and Apache County (Arizona)
Active Channels:	20
Local Origination:	1 channel

GH Cable Arizona (Eagar Headend)

Subscribers:	1271
Communities:	Springerville, Eagar, and Apache County (Arizona)
Active Channels:	22
Local Origination:	1 channel

GH Cable Arizona (Columbia Headend)

Subscribers:	3159
Communities:	Columbia and Marion County (Mississippi)
Active Channels:	32
Local Origination:	1 channel

The subscriber and channel information is correct as of March 31, 1994.

April 25, 1994
Date

George F. Gardner
George F. Gardner

5

JOHN J. MULLANEY
JOHN H. MULLANEY, P.E.

MULLANEY ENGINEERING, INC.
9049 SHADY GROVE COURT
GAITHERSBURG, MD 20877

301 921-0115

GLENDALE EXHIBIT NO. 5:

GLENDALE BROADCASTING COMPANY
MONROE, GEORGIA
MM DOCKET 93-156 BPCT-920228KC

APRIL 25, 1994

TESTIMONY OF JOHN J. MULLANEY
SHORT SPACING ISSUE

Federal Communications Commission

Docket No. 93 136 Exhibit No. 53

Presented by Calendar

Disposition { Identified 5.18.94 / Received 5.18.94 / Rejected }

Reporter AMW

Date 5.18.94

GLENDALE EXHIBIT NO. 5:

GLENDALE BROADCASTING COMPANY
MONROE, GEORGIA
MM DOCKET 93-156 BPCT-920228KC

******

TESTIMONY OF JOHN J. MULLANEY
SHORT SPACING ISSUE

TABLE OF CONTENTS:

GLENDALE EXHIBIT NO. 5:

GLENDALE BROADCASTING COMPANY
MONROE, GEORGIA
MM DOCKET 93-156 BPCT-920228KC

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TESTIMONY OF JOHN J. MULLANEY
SHORT SPACING ISSUE

NARRATIVE STATEMENT:

John J. Mullaney under penalty of perjury, now declares that the following is true and correct to the best of his knowledge:

I am a broadcast engineer who has represented applicants before the Federal Communications Commission since 1977. I hold a Bachelor's degree in Electrical Engineering from the Catholic University of America. I am the consulting engineer for Glendale Broadcasting Company (Glendale) with respect to its application for a new commercial television station at Monroe, Georgia.

In January 1992, I performed a study on behalf of Glendale to determine where Glendale could locate its transmitter and antenna. I determined where Trinity Broadcasting Network (Trinity), whose renewal application Glendale was filing against, had located its transmitter and antenna for WHSG(TV), Monroe, Georgia. I determined that the spacing between the WHSG(TV) antenna and the reference point for the educational allotment at Channel *63, Montgomery, Alabama was 262.66 kilometers. Under Section 73.610(b) of the Commission's rules, the minimum required separation between the WHSG(TV) antenna and the reference point for the Montgomery allocation is 280.8

kilometers. A short-spacing of 18.14 kilometers thus existed between the WHSG(TV) facility and the Montgomery reference point.

I determined that the short-spacing developed in the following manner. The Troy State University System (Troy State) at some point held a construction permit for Channel 63 in Montgomery. Troy State modified its construction permit to specify a transmitter site at coordinates 32-17-24 North Latitude, 86-30-40 West Longitude. The site was fully spaced to the site that became Trinity's transmitter site, and that site would have been fully spaced to both transmitter sites specified by Glendale. In 1990, the Commission cancelled Troy State's construction permit. Under the Commission's normal policy involving short-spacings, it should have specified Troy State's transmitter site as the reference point for the allocation. Instead, the Commission specified the original reference point in the city of Montgomery which was now short-spaced by 18.14 kilometers to the site specified in the Monroe, GA, construction permit. The Troy State transmitter site or some other properly spaced location should have been specified as the reference point because the purpose of reference is to ensure that an allocation is protected so that another allocation or application will not eliminate the available site area for the allocation. In this case, however, no applicant for the Montgomery channel could have specified the reference point in the city of Montgomery as the transmitter site because that point was short-spaced by 18.14 kilometers to the WHSG transmitter site.

I advised Glendale that it could locate its antenna less than 280.8 kilometers from the Montgomery reference point so long as it did not move closer to the Montgomery reference point than WHSG(TV) was. I believed then and believe now that that advice was consistent with Commission

policy. I recommended that Glendale locate a site (1) as close as possible to WHSG(TV)'s existing tower and (2) no closer to the Montgomery reference point than WHSG(TV)'s tower was. I gave that advice because I knew it was difficult to get approval of the Federal Aviation Administration (FAA) for a tall television tower such as Glendale was proposing (over 1100 feet), and in my experience, the FAA was more likely to approve a tall tower if it was located close to an existing tower of similar height (such as the WHSG tower).

Gregory Daly, a site consultant retained by Glendale, obtained reasonable assurance of site availability for a piece of land owned by Martha Day Bryant (the Bryant site). Glendale specified the Bryant site as its transmitter site in its original application, which was filed on February 28, 1992. The Bryant site was 1.78 km farther away from the Montgomery reference point than WHSG(TV)'s facility. The Bryant site was approximately 3.55 km north of the WHSG(TV) tower.

At my recommendation, Glendale retained John P. Allen, an aeronautical consultant, to review Glendale's proposed tower and to assist Glendale in obtaining FAA clearance for the proposed tower. In February 1992, Mr. Allen conducted a preliminary study which led him to believe that the FAA would issue a determination of no hazard to air navigation for the proposed tower.

In September 1992, I learned that the FAA was objecting to Glendale's proposed tower. The basis for the objection was the existence of an unpublished Visual Flight Rules route near Glendale's proposed tower. I had a telephone conversation with Mr. Allen and Mr. Robert Shipp of the FAA concerning the FAA's objection. After a series of negotiations with the FAA, the FAA said it would accept a

tower within 2,000 feet to the northwest or southeast of the existing WHSG(TV) tower. Mr. Daly was retained to locate another site as close as possible to the WHSG(TV) tower in the directions required by the FAA. The only site Mr. Daly found was a site about one-half mile northwest of the WHSG(TV) tower that was owned by Clarence Hall (the Hall site).

At that point in time, it was not practical for Glendale to specify a site which was more than 280.8 kilometers from the Montgomery reference point. Even if a site was available in that area, the FAA would not approve Glendale's proposal in that area without conducting a new aeronautical study and requesting a new round of comments from the public. Such a process would take several months (6-8 months), and I knew that the Commission requires applicants to amend their applications promptly to resolve any problems with their applications. I also knew that if Glendale amended to a site in a properly spaced area, it was always possible that the FAA could reject that site because of another unpublished VFR route or for some other reason.

The FAA issued a determination of no hazard to air navigation for the Hall site on December 16, 1992, and that determination became final January 25, 1993. The Hall site is 262.40 kilometers from the Montgomery reference point, which is 0.26 kilometers (853 feet) closer to the Montgomery reference point than the existing WHSG(TV). Glendale amended its application on March 5, 1993 to specify the Hall site as its transmitter.

Figure 1 to this exhibit is a map which shows the allowable area the Monroe facility on Ch. 63 and the sites discussed herein. The site specified in Glendale's original application is labelled "Bryant Site". The site

currently being specified by Glendale is labelled "Hall Site". This map differs slightly from the one originally prepared by this office. It now includes the spacing limitation (280.8 km) imposed by the operation of WQHB on Ch. 63 at Sumter, SC. While this limitation existed in January 1992, it was omitted from the map since the decision was already made to concentrate on a site near the existing WHSG(TV) site which was over 20 kilometers beyond the minimum spacing to WHSG.

The 0.26 kilometer difference in distance is less than one-thousandth of the total difference between the Montgomery reference point and either the WHSG(TV) site or the Hall Site. The extra 0.26 kilometers makes no discernable impact on the Montgomery allocation over and above the impact already caused by the WHSG(TV) site. While WHSG(TV) currently operates with a directional antenna 1190 feet above average terrain and a maximum effective radiated power of 5,000 kw, there is no Commission rule or policy that would prevent Trinity from increasing the height of its antenna to the maximum HAAT permitted by the Commission's rules (1968 feet HAAT) despite the exiting short spacing of 18.14 kilometers to the Montgomery reference point.

Glendale's proposal would provide greater protection to the Montgomery allocation than a hypothetical full-spaced station operating with the maximum facilities permitted by the Commission's rules. The Commission's spacing requirements are based upon the determination that the station will cause objectionable interference to a second station operation on the same channel at locations where the first stations signal is more than 28 dB stronger (F50,10). Since a UHF station's protected contour is the 64 dBu contour (F50,50) the appropriate interference contour is the 36 dBu contour (F50,10). Because Glendale

is using a directional antenna, its ERP in the direction of the Montgomery allocation is less than 4,000 kw. Its antenna is also considerably lower (over 780 feet lower) than the maximum height permitted by the Commission's rules. For these reasons, Glendale's 36 dBu contour extends at least 26 kilometers less than the 36 dBu contour of a station proposing maximum facilities. Suppose an applicant proposed to build a station with maximum facilities on Channel 63, 20 kilometers away from Glendale's proposed station and more than 280.8 kilometers from the Montgomery reference point. That facility's co-channel interference 36 dBu contour would extend at least 6 kilometers further toward the Montgomery reference point than Glendale's co-channel interference contour. Therefore, Glendale's proposal would not result in objectionable interference.

A grant of Glendale's application would not materially reduce the area within which an applicant for the Montgomery channel could locate a site. Any applicant for Channel 63 in Montgomery would have to specify a site at least 280.8 kilometers from the WHSG(TV) site. A denial of Glendale's application would not appreciably increase the available area within which a Montgomery applicant could locate a site because such an applicant would still have to protect the WHSG(TV) site. If Glendale's application is granted, an applicant would have an area of least 517 square kilometers within which to locate a site. That calculation assumes that the applicant for the Montgomery channel is proposing 3000 kw ERP with an antenna 300 meters HAAT (modest facilities), which is considerably less than the maximum facilities allowed by the Commission. If an applicant proposes maximum facilities, the available area within which a site could be placed could be increased to 1,800 square kilometers. Figure 2 is a map showing the

available site area for both a modest facility and a maximum facility on Channel 63 at Montgomery. In addition, this map also show the last CP site held by Troy State. As can be seen, the Troy State CP site is well beyond the minimum spacing to both WHSG & Glendale.

Glendale's proposal would also provide greater coverage than a site more than 280.8 kilometers from the Montgomery reference point. Glendale's current proposal would serve 3,120,568 people (value differs from 301 application due to the use of more bearings). In pleadings filed in this proceeding, Trinity has referred to a tower owned by Shamrock Broadcasting, Inc. and used by WFOX(FM) at coordinates 34-07-32 North Latitude and 83-51-31 West Longitude. A declaration submitted by Trinity refers to space 491 meters above ground on that tower that would allegedly accommodate a television antenna. If someone constructed a station on Channel 63 using a similar directional antenna at 491 meters above ground on that tower and with the maximum permissible ERP of 5,000 kw, that station would serve 2,932,547 people, or approximately 188,021 people less than Glendale's station would serve. However, it should be understood that since WHSG currently operates a move to the WFOX tower would result in 375,496 people losing a service they are presently receiving. The WFOX site is some 44.9 kilometers north-northeast of Glendale's proposed site.

Finally, Glendale filed a request on September 22, 1993 with the Allocations Branch of the Mass Media Bureau asking that the reference point for Channel 63 in Montgomery be moved to a point that would be fully-spaced to both the WHSG(TV) site and to Glendale's current site. Such an action would eliminate the short-spacing and would also ensure that the Montgomery allocation is fully protected. Because the current reference point is short-spaced by